

# NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

## FACT SHEET

(pursuant to NAC 445A.236)

**Permittee:** Winner Properties, LLC  
9601 Orient Express Court.  
Las Vegas, Nevada 89145

**Permit:** NEV2008509 (Formerly NV0022012)

**Location:** Former Reno Plastics, Inc. Facility  
14291 Lear Blvd.  
Reno, Washoe County, NV  
Latitude: 39° 38' 36" N, Longitude: 119° 53' 22" W  
Township 21N, Range 19E, NE¼ Section 31

**Well Head and Drinking Water Supply Protection:** The Lemmon Valley Water Reclamation Facility (WRF) is located within the 6000' but outside the 3000' Drinking Water Protection Areas (DWPAs) of one well owned by the Truckee Meadows Water Authority. The facility is outside any established Well Head Protection Zone.

**General:** The Winner Properties LLC facility, formerly the Reno Plastics facility administered under NPDES permit NV0022012, discharges treated groundwater to an unnamed seasonally playa lake located ¼ mile NE of Silver Lake. Correspondence from the U.S. Army Corp of Engineers (11/07/2006, 03/21/2007, and 05/17/2007) has determined that the Swan Lake Basin, including the unnamed playa ¼ mile northeast Silver Lake Playa to which the groundwater remediation system discharges, is not a jurisdictional water, in accordance with the U.S. Supreme Court decision in SWANCC vs. U.S. Army Corps of Engineers. The determination is related to Section 404 of the Clean Water Act. This determination removes the requirement for operating under the NPDES permit, thus allowing the NPDES permit to be terminated. Nevada Division of Environmental Protection (NDEP) has determined that the facility is required to obtain a State of Nevada Groundwater Discharge Permit. The facility continues to operate under the NPDES permit until the Groundwater Discharge Permit is issued.

From 1989 to 1991, BWC West, Inc., a subsidiary of the Bradford White Corporation manufactured water heaters at this industrial site in Reno-Stead, Washoe County, NV. The manufacturing operations included metal stamping/forming, painting and assembly of water heaters. Degreasing liquids from the manufacturing process were improperly disposed onto the soils surrounding the main plant building. The chlorinated contaminants of concern in these degreasers were 1,1-Dichloroethene (DCE), 1,1-Dichloroethane (DCA), and 1,1,1-Trichloroethane (TCA). Prior to bankruptcy, BWC West, Inc. installed a groundwater remediation system and began groundwater cleanup operations in July 1991. In addition, the contaminated soils were removed and a warehouse building and parking lot pavement were later built over the former disposal area. The property was then sold to American Water Heater Company (1992-2000), and then to Reno Plastics, Inc., which manufactured plastic cards (e.g., credit & gift cards) until 2008. The current owner of the property and operator of the groundwater remediation system is Winner Properties LLC. Groundwater remediation at the site is required by the NDEP Bureau of Corrective Actions, and is administered under NDEP Facility ID Number D-000509.

The groundwater remediation process consists of compressed air extraction and activated carbon

adsorption. The pump and treat process is designed for 11 gpm. A total of seven (7) extraction and nine (9) monitoring wells have been installed on this property and an adjoining industrial neighbor, Master-Halco. Currently, five of the seven wells are used for groundwater extraction. Extracted groundwater is combined at an equalization tank, which then feeds through a sediment filter to two (2) 1000-pound granular activated carbon adsorption vessels in series. The treated groundwater is samples and routed for discharge to a storm drain inlet and ultimately to the seasonal playa lake ¼ mile NE of Silver Lake.

During the period from August 2003 through November 2007, DCE, DCA, and TCA were detected only once. During that period, discharge from the treatment system had the following analytical results:

| PARAMETER                           | Permit Limit     | AVERAGE | MAXIMUM | MINIMUM |
|-------------------------------------|------------------|---------|---------|---------|
| Flow (MGD)                          | 0.0158           | 0.0012  | 0.002   | 0.0006  |
| 1,1 Dichloroethene (DCE)<br>(µg/L)  | 7                | <1.0    | 6.8     | <1.0    |
| 1, Dichloroethane (DCA)<br>(µg/L)   | Monitor & Report | <1.0    | 1.8     | <1.0    |
| 1,1 Trichloroethane (TCA)<br>(µg/L) | 200              | <1.0    | 1.6     | <1.0    |
| Trichloroethene (TCE)<br>(µg/L)     | Monitor & Report | <1.0    | <1.0    | <1.0    |
| pH (Standard Units)                 | 6.0 to 9.0       | 7.23    | 7.75    | 6.91    |

Except for routine maintenance and repairs, the groundwater remediation system has been in operation for approximately twelve years.

**Flow:** The design treatment capacity of the groundwater remediation system is 11 gpm, or 0.0158 million gallons per day (MGD) (15,800 gallons per day). Discharge from the system during the period from August 2003 through November 2007 averaged 0.0012 MGD.

**Receiving Water Characteristics:** The storm drain inlet for the property's stormwater is located at the NW corner of the site. Four seasonal lakes/playas are located due north and west of the property site. The main water body is Silver Lake and the three smaller lakes/playas are unnamed. These seasonal lakes/playas generally maintain standing water only during periods of winter stormwater runoff and evaporate completely in the summer. The nearest stormwater discharge point for the Permittee's property is located due north of the property across a railroad spur, and discharges into the unnamed lake/pond located approximately ¼ mile northeast of Silver Lake. The Nevada Administrative Code does not list any beneficial uses for Silver Lake and the three adjoining unnamed lakes; these playa are unclassified waters of the State. The seasonal playa are not used for municipal or domestic supplies. Groundwater occurrence at this site is shallow (4 to 14 ft. bgs) and the flow gradient is toward the north-northwest.

**Proposed Effluent Limitations and Special Conditions:**

Discharge from the facility shall be limited and monitored according to the following:

- Sampling Locations:
1. Flowmeter;
  2. Sampling port at inlet to Carbon Canister 1;

3. Sampling port at inlet to Carbon Canister 2;
4. Sampling port at discharge from Carbon Canister 2 (**Outfall 001**).

**Table 1: Discharge Limitations**

| PARAMETER                                | SAMPLING LOCATION | DISCHARGE LIMITATIONS |               | MONITORING REQUIREMENTS |             |
|--|-------------------|-----------------------|---------------|-------------------------|-------------|
|  |                   | 30-Day Average        | Daily Maximum | Measurement Frequency   | Sample Type |
| Flow, MGD                                | 1                 | 0.0158 (11 gpm)       |               | Continuous              | Flow Meter  |
| 1,1-Dichloroethene, µg/L <sup>1</sup>    | 2, 3              | Monitor & Report      |               | Quarterly               | Discrete    |
|  | 4                 | 7                     |               | Quarterly               | Discrete    |
| 1,1-Dichloroethane, µg/L <sup>1</sup>    | 2, 3, 4           | Monitor & Report      |               | Quarterly               | Discrete    |
| 1,1,1-Trichloroethane, µg/L <sup>1</sup> | 2, 3              | Monitor & Report      |               | Quarterly               | Discrete    |
|  | 4                 | 200                   |               | Quarterly               | Discrete    |
| pH, S.U.                                 | 4                 | Between 6.0 & 9.0     |               | Quarterly               | Discrete    |

1. EPA Method 601 (report all parameters).

**Schedule of Compliance:** The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance any additions or modifications that the Administrator may make in approving the schedule of compliance.

- a. By MMM DD, 2008, the Permittee shall submit for Division review and approval an updated Operations & Maintenance (O&M) Manual.

**Procedures for Public Comment:** The Notice of the Division's intent to issue an Nevada Groundwater Discharge permit authorizing the facility to discharge treated groundwater, subject to the conditions contained within, is being sent to the **Reno Gazette-Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline date and time by which all comments are to be submitted (via postmarked mail or time-stamped faxes, e-mails, or hand-delivered items) to the Division is **August 18, 2008 by 5:00 P.M.**

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person or group of persons.

The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission

pursuant to NRS 445A.605.

**Proposed Determination:** The Division has made the tentative determination to issue the proposed permit to the facility for a period of five (5) years.

Prepared by: Janine Hartley  
March 2008